

March 17, 2020

**PRIVILEGED AND CONFIDENTIAL ATTORNEY WORK PRODUCT**

**Re: Freedom of Information Act Request  
CalMat Co.**

Pursuant to the Freedom of Information Act (“FOIA”), on behalf of our client CalMat Co. (“CalMat”), we request that the United States Environmental Protection Agency (“EPA”) provide the following documents and/or records:

- 1) All communications exchanged between the United States Environmental Protection Agency (“EPA”) and Los Angeles By-Products Co., a California corporation (“LABP”), relating to the property located at 7361 Laurel Canyon Boulevard, North Hollywood, California, 91605 (the “Hewitt Site”).
- 2) All documents and records that identify the types of materials, waste products, solvents, chemicals, and/or compounds that LABP accepted, disposed of, and/or allowed at the Hewitt Site.
- 3) The May 8, 1981 Inquiry Into the Contents of the Hewitt Pit Sanitary Landfill from Jack Betz of the Los Angeles Department of Water and Power (“LADWP”).
- 4) The 1993 General Notice Letters from the EPA to LABP, CalMat, and/or other Potentially Responsible Parties (“PRP”), and any responses from CalMat.
- 5) The July 1, 2010 Special Notice Letters from the EPA to LABP, CalMat, and/or other PRPs, and any responses from CalMat.
- 6) The following pleadings, which are not available from the court, filed in *United States of America v. Allied-Signal Inc., et al.*, Case No. 2:93-cv-06490-MRP-T, filed in the United States District Court, Central District of California, on October 26, 1993:
  - a) Docket No. 29 – Filed 09/23/1994 – NOTICE OF DISMISSAL by plaintiff Los Angeles By-Products Co. pursuant to FRCP 41a(1) voluntarily dismiss the cause of action against Pacific Energy Inc a California Corp only without prejudice.
  - b) Docket No. 33 – Filed 10/04/1994 – PRAECIPE: in re issuance on ex claim.
  - c) Filed 11/21/1994 – LODGED/PROPOSED Order granting leave to file first amendment and supply third party complaint

- d) Filed 11/21/1994 – LODGED first amd and suppl third pty cmp. third pty submitted by third-party plaintiff CA Car Hikers Svc
  - e) Docket No. 127 – Filed 07/12/1995 – FIRST AMENDED ANSWER by cross-defendant Parker-Hannifin Corp. [124-1] to cross-claims of Inchcape Inc.
  - f) Docket No. 157 – Filed 09/28/1995 – FIRST AMENDED COMPLAINT [1-1] by plaintiff USA; adding Niels Bruun Andersen, Calmat Co., William L Cooke, Jerry Conrow, Fleetwood Machine, Lockheed Air, Lockheed Corporation, Pacific Steel Treat, Pick-Your-Part Auto, Waste Mgmt Recycling.
  - g) Docket No. 163 – Filed 10/16/1995 – AMENDED PROOF OF SERVICE by defendant Allied-Signal Inc of ans to plfs US First amcmp.
  - h) Docket No. 210 – Filed 04/11/1996 – ANSWER TO THIRD PARTY COMPLAINT [202-1] by third-party defendant Chase Chemical Co.
  - i) Filed 02/18/1997 – LODGED 2nd partial consent decree submitted by plaintiff USA.
- 7) The following pleadings, which are not available from the court, filed in *The State of California v. Allied-Signal Inc., et al.*, Case No. 2:93-cv-06570-MRP-T, filed in the United States District Court, Central District of California, on October 29, 1993:
- a) Docket No. 16 – Filed 08/22/1994 – THIRD-PARTY COMPLAINT: by defendant LA By-Products Co; adding Pacific Energy, Conejo Enterprises, Crown Disposal Comp, Western Waste Ind, Price Pfister Inc, H R Trextron Inc, Browning-Ferris Ind, Ricon Corp, Metal Improvement, Curtiss-Wright Corp, AVX Filters Corp, E I DuPont De Nemour.
  - b) Docket No. 66 – Filed 05/01/1995 – COUNTERCLAIM by third-party defendant Electronic Solutions, third-party defendant Zero Corp against third-party plaintiff Gordon N Wagner, third-party plaintiff Peggy M Wagner, third-party plaintiff Joseph W Basinger.
  - c) Docket No. 67 – Filed 05/01/1995 – ANSWER TO THIRD PARTY COMPLAINT of Gordon N. Wagner and Peggy M. Wagner, in their capacity as trustees of the Wagner Living Trust; and Joseph Basinger [13-1] by third-party defendant Electronic Solutions, third-party defendant Zero Corp.
  - d) Docket No. 68 – Filed 05/01/1995 – THIRD-PARTY COMPLAINT: by third-party plaintiffs Electronic Solutions, and Zero Corp;(agnst) adding Hawker Pacific Inc.

- e) Docket No. 69 – Filed 05/01/1995 – CROSSCLAIM by third-party defendants Electronic Solutions, and Zero Corp against third-party cross-defendants Parker Hannifin Inc, and Inchcape Inc.
- f) Docket No. 80 – Filed 05/12/1997 – SECOND PARTIAL CONSENT DECREE.
- 8) The 2018 Settlement Agreement entered into between Lockheed Martin and LADWP.
- 9) All settlement agreements entered into between Honeywell and LADWP and/or LABP.
- 10) All correspondence from Honeywell to CalMat and/or LABP around February 2014 concerning the Second Interim Remedy for the North Hollywood Operable Unit (“NHOU”) of the San Fernando Valley Superfund Site.
- 11) Documents evidencing payments made by CalMat to the EPA for the 1996 Partial Consent Decree concerning the NHOU, including but not limited to check copies, receipts, invoices, and wire transfer confirmations.
- 12) Documents evidencing payments made by CalMat to the EPA for the August 2008 Settlement Agreement for Recovery of Response Costs concerning the NHOU, including but not limited to check copies, receipts, invoices, and wire transfer confirmations.

We agree to pay all reasonable costs in connection with this request, up to a limit of \$1,000. If you estimate that fees will exceed this limit, please contact me prior to proceeding.